



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 2, 2008

RE: Cooper Drum Company Superfund Site, 9316 South Atlantic Avenue, South Gate, California: Special Notice Letter and Good Faith Offer

Dear Sir and Madam:

By letter dated May 23, 2008, you were sent special notice of your potential liability for costs incurred in connection with contamination at the Cooper Drum Company Superfund Site (the "Site"). The May 23 special notice letter was sent to 68 recipients. All recipients were directed to submit a "good faith offer" to the United States to conduct or finance the remedial action at the Site within the sixty day negotiation moratorium which began with your receipt of the special notice letter (see letter dated May 23, 2008, from Kathleen Salyer). All recipients were also encouraged to contact EPA by June 15, 2008, to indicate their willingness to participate in future negotiations concerning the Site.

EPA has received responses on behalf of 50 of the special notice recipients. The responses generally indicate a willingness to work with EPA but request more information on liability allocations in order to structure a good faith offer.

As you are aware, EPA has worked with you over the last year to provide you with all non-privileged information in EPA's possession or control relevant to the Site and to your responsibility for cleanup. EPA established a website, to which you have access, and posted all non-privileged documents, including the customer specification records and the truck driver pick-up slips in EPA's possession, and the responses of all parties to EPA's information requests. EPA also proposed to conduct pre-litigation depositions of the Cooper Drum ex-employee witnesses who have relevant information, pursuant to Rule 27 of the Federal Rules of Civil Procedure. The Court initially granted EPA's petition to take these depositions, and EPA hosted a meeting in Downey, California in November 2007, to which you were invited, to discuss, among other things, procedures for the depositions.

After protracted discussions between EPA, the Department of Justice, and the special notice recipients, a group of the special notice recipients belatedly petitioned the Court to vacate its order allowing the depositions, and the Court did so. At that point, EPA concluded that the most efficient way to move the Site cleanup process forward was the issuance of special notice.

To facilitate the formation of a working group, and the submission of a good faith offer within the 60 day moratorium period, EPA has enclosed with this letter a spreadsheet listing the 66 generator parties and indicating the range of drums per month sent by each party to the Site. These ranges were calculated based on EPA's discussions with witnesses involved in Site operations, truck driver pick-up slips, and responses to information requests to the parties. Assuming receipt of a good faith offer within the 60 day moratorium period, EPA and the Department of Justice are willing to seek sworn declarations from the witnesses whose testimony supports the information on the enclosed spreadsheet.

If EPA receives a good faith offer within the initial 60 day moratorium, EPA will extend the moratorium period for an additional 60 days to negotiate a Consent Decree with you for the remedial action and the payment of past costs at the Site incurred by the United States. EPA considers these moratorium dates to be firm. As set out in the special notice letter, if your good faith offer is not received as required EPA will determine that you are not willing to cooperate voluntarily and will then consider issuing you a Unilateral Administrative Order to perform the work described in the Record of Decision for the Site.

Please send your written proposal to perform the remedial action to:

Eric Yunker (SFD 7-3)
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3159

Please direct any legal questions to:

Jim Collins (ORC-3)
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3894

Sincerely,

A handwritten signature in dark ink, appearing to read "Kathleen Salyer". The signature is fluid and cursive, with the first name "Kathleen" written in a larger, more prominent script than the last name "Salyer".

Kathleen Salyer, Chief
Site Cleanup Branch, Superfund Division

Enclosure:
Cooper Drum Company – Facility Drum Count Summary

Cooper Drum - Facility Drum Count Summary (Updated 7-2-08)

Quantities	#	Liabe Party	Generator Name
> 5000	1	Atlantic Richfield Company	Atlantic Richfield Company
		22600 S. Wilmington Ave., Carson, CA	
		Hawthorne, CA	
	2	ExxonMobil Oil Corporation	Mobil Oil Corporation
		2619 E. 37th St., Los Angeles/Vernon, CA (former Mobil facility)	
		Torrance, CA (ExxonMobil Refinery)	
	3	Lubricating Specialties Company	Lubricating Specialties Company
		8015 Paramount Blvd., Pico Rivera, CA	
		East 61st Street, Commerce, CA	
		Lincoln Park, CA	
		Vernon, CA	
	4	Shell Oil Company	Shell Oil Company
		1622 E. Sepulveda Blvd., Carson, CA	
		Wilmington, CA	
	5	Texaco Refining & Marketing	Texaco Refining & Marketing
		1926/2101 E. Pacific Coast Highway, Wilmington, CA	
	6	Union Oil Company of California	Unocal
		13707 S. Broadway, Los Angeles, CA	
2000 to 5000	7	Ashland, Inc.	Ashland Chemical, Inc./Valvoline, Inc.
		10505 S. Painter Ave., Santa Fe Springs, CA (formerly Ashland Chemical)	
		9313 Sorensen Ave., Santa Fe Springs, CA (formerly Valvoline)	
	8	Cargill Inc.	Cargill, Inc.
		2801 Lynwood Rd., Lynwood, CA	
	9	Chevron Corporation	Chevron Corporation
		El Segundo, CA (Chevron Refinery Facility)	
		Gulf Oil Corporation	
	10	Chemcentral Corporation	Chemcentral Corporation
		13900 Carmenita Rd., Santa Fe Springs, CA	
	11	Chemtura Corporation	Witco Chemical Company, Golden Bear Division
		Manor and Norris Roads, Oildale, CA	
		4000 Washington Blvd., Vernon CA	
	12	Engineered Polymer Solutions, Inc.	Guardsman Chemical Company
		9845 Miller Way, South Gate, CA	
	13	Univar USA, Inc.	Van Waters & Rogers
		1363 S. Bonnie Beach Place, Commerce, CA	
	14	Pennzoil-Quaker State Company	Pennzoil Company/Quaker State Company
		26th Street, Vernon (Pennzoil Company)	
		Commerce, CA (Pennzoil Company)	
		Terminal Island, Long Beach, CA (Quaker State)	
	15	SOCO West, Inc.	Holchem, Incorporated/Crown Chemical
		3270 E. Washington Blvd., Los Angeles, CA (SOCO)	
		1888 Nirvana Ave., Chula Vista, CA (Crown Chemical)	
		San Fernando Rd. at 118 Freeway, Pacoima, CA (Holchem, Inc.)	
	16	Waste Management, Inc.	Oil & Solvent Process Company/Chemical Waste
		1704 W. First Street, Asusa, CA	
1000 to 2000	17	Castrol Industrial North America, Inc.	Castrol Industrial West, Inc.
		5511 District Blvd., Los Angeles, CA	
	18	Hasco Oil Company, Inc.	Hasco Oil Company
		2800 Temple Ave., Long Beach, CA	
	19	Lonza Inc.	Lonza, Inc.
		20851 S. Santa Fe Ave., Long Beach, CA	
	20	Southern California Edison (during the mid 1980's	Southern California Edison
		501 South Marengo Ave., Alhambra, CA	
500-1000	21	A.G. Layne, Inc.	A.G. Layne, Inc.
		4578 Brazil Street, Los Angeles, CA	
	22	Baker Petrolite Corporation	Baker Performance Chemicals
		11808 S. Bloomfield Ave., Santa Fe Springs, CA	
		5501 District Blvd., Bakersfield, CA	
		Boylan St., Bakersfield, CA	
	23	D.A. Stuart Company	Far-Best Corporation
		6715 McKinley Ave., Los Angeles, CA	
	24	Dunn-Edwards Corporation	Dunn-Edwards Corporation
		4869 E. Slauson St., Maywood, CA	
		61st Street, Commerce, CA	
	25	J.H. Mitchell & Sons Distributors, Inc.	J.H. Mitchell & Sons
		14515 Joanbridge St., Baldwin Park, CA	
	26	Penreco, Inc.	Penreco, Inc.
		4426 East Washington Blvd., Los Angeles, CA	
		Bandini Ave., Los Angeles, CA	
		22nd Street, Vernon, CA	
	27	PPG Industries, Inc.	PPG Industries, Inc.
		465 Crenshaw Blvd., Torrance, CA	
	28	The Alpha Corporation of Tennessee	Alpha Chemical
		19991 Seaton Ave., Perris, CA	
100-500	29	Citgo Petroleum Company	Citgo Petroleum Company
		1926 E. Pacific Coast Highway, Wilmington, CA	
	30	Coral Chemical Company	Coral Chemical Company
		7200 Coral Lane, Paramount, CA	
	31	Crosby and Overton, Inc.	Crosby & Overton
		1610 W. 17th St., Long Beach, CA	
	32	Gallade Chemical, Inc.	Orange County Chemical Company
		1230 E. Gertrude Place, Santa Ana, CA	
	33	GE Betz, Inc.	Betz Laboratories, Inc.
		3050 Pegasus Rd., Bakersfield, CA	
		3154 E. Harcourt, Compton, CA	
	34	Houghton International Inc.	E.F. Houghton & Company
		3431 Carriage Drive, Santa Ana, CA	
	35	Lockheed Corporation	Lockheed Corporation
		Burbank, CA	
		Lancaster, CA	
	36	McKesson Corporation	Foremost McKesson Corporation
		9501 Norwalk Blvd., Santa Fe Springs, CA	
	37	M.O. Dion & Sons, Inc.	M.O. Dion & Sons, Inc.
		1543 W. 16th Street, Long Beach, CA	
	38	Mathisen Oil Company	Mathisen Oil Company
		10685 Central Avenue, Montclair, CA	
	39	Mouren-Laurens Oil Company	Mouren-Laurens Oil Company
		641 E. Compton Blvd., Compton, CA	
	40	Petro Lock Inc.	Petrolock, Inc.
		45315 N. Trevor Ave., Lancaster, CA	
		8841 E. Ave. J., Lancaster, CA	

Cooper Drum - Facility Drum Count Summary (Updated 7-2-08)

Quantities		Liabe Party	Generator Name
	41	PMC, Inc. 10051 Romandel Ave., Santa Fe Springs, CA	PMC Specialties Group, Inc.
	42	Powerine Oil Company 12345 Lakeland Road, Santa Fe Springs, CA	Powerine Oil Company
	43	PTM & W Industries, Inc. 10640 S. Painter Ave., Santa Fe Springs, Ca	P T M & W Industries, Inc.
	44	Quaker Chemical Corporation 10735 Kadota Ave., Pomona, CA	Quaker Chemical Corporation
	45	Rathon Corporation 8921 South Dice Road, Santa Fe Springs, CA	Diversey Wyandotte, Inc.
	46	Southern Counties Oil Co. 1825 W. Collins Avenue, Orange, California 92867	Southern Counties Oil Co.
	47	Sta-Lube, Inc. 3039 Ana Street, Rancho Dominguez/Compton, CA	Sta-Lube, Inc.
	48	Shell Chemical Company San Pedro, CA	Shell Chemical Company
	49	Stuarts' Petroleum 11 East 4th Street, Bakersfield, California 93307	Stuarts' Petroleum Corporation
	50	Territorial Distributors, Inc. 243 Puuhale Rd., Honolulu, HI (via Port of Entry, Long Beach, CA)	Territorial Distributors, Inc.
	51	The SoCo Group, Inc. 145 Vernon Way, El Cajon, CA	The SoCo Group, Inc.
		50 East Main Street, El Centro, CA	
	52	Vast Enterprises, Inc. 7734 Alondra Blvd., Paramount, CA	South Bay Oil Company
	53	Viacom, Inc. 18020 S. Santa Fe Ave., Compton, CA	Westinghouse Electric Corporation
		San Diego, CA	
	54	Winco Enterprises, Inc. 1050 W. 5th Street, Azusa, CA	Wynn Oil Company
< 100	55	AC Products, Inc.	AC Products, Inc.
	56	American Polymers Corp. 14722 Spring Ave., Santa Fe Springs, CA	Polycoat Products Company
	57	Avery Dennison Corporation Commerce, CA (Avery Labels) Maywood, CA (Avery Labels)	Avery Labels
		777 E. Foothill Blvd., Azusa, CA	
		1616 South California Ave, Monrovia, CA	
	58	General Electric Company 3601 East La Palma, Anaheim, CA	General Electric Company
	59	General Motors Corporation 8000 Van Nuys Blvd., Van Nuys, CA	General Motors Corporation
	60	Henry Company 2911 Slauson Ave., Huntington Park, CA	Henry Company
	61	Oakite Products, Inc. 16961 Knott Ave., La Mirada, CA	Ardrox, Inc.
	62	PolyOne Corporation 5701 E. Union Pacific Ave., Los Angeles, CA	Diversified Compounders, Inc.
	63	Sun Chemical Corporation 590 South Santa Fe Ave., Los Angeles, CA	Sun Chemical Corporation
		551 District Blvd., Bakersfield, CA (formerly General Printing, Inc.)	
	64	The Boeing Company 3370 E. Miraloma Ave., Anaheim, CA	Rockwell International Corporation
		San Diego, CA	
	65	The Valspar Corporation 1004 W. Tenth Street, Azusa, CA	The Valspar Corporation
	66	Unisource Worldwide, Inc. 13101 S. Main Street, Los Angeles, CA	Sanichem Mfg. Company

Notes:

• Ranges indicate number of drums transported per month from the PRP facility to theCooper Drum facility.

• Specific time periods of drum contribution vary among the PRPs.

• Yellow highlighting indicates the drum count facility breakdown was based on an estimate from all facilities.

66 PRPs Representing 72 Generators.